

**IN THE UNITED STATES  
DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**UNITED STATES OF  
AMERICA,**

**V.**

**LATYND A NEISHAY BENTLEY,  
DEFENDANT.**

**CASE NUMBER**

**2:07-CR-01-MHT-CSC**

**MOTION TO CONTINUE TRIAL**

**COMES NOW** the defendant, LaTynda Neishay Bentley, by and through the undersigned counsel and moves this Honorable Court to continue her Trial by stating the following:

1. Defendant's case is set for trial on the June 4, 2007 Trial Term.
2. Discovery in this case is voluminous and contains over 1,000 pages of discovery.
3. In order to prepare a proper defense, Counsel will need additional time to review the discovery.
4. Counsel has spoken to the Government and there is no objection to the requested continuance.

**WHEREFORE, THE PREMISES CONSIDERED**, Defendant prays that this Honorable Court will grant the foregoing and continue the Defendant's trial to the next Trial term

**RESPECTFULLY SUBMITTED** this the 1st day of May, 2007.

/s/ Daniel G. Hamm

---

DANIEL G. HAMM (HAM043)  
ATTORNEY FOR THE DEFENDANT  
560 S. McDONOUGH ST., STE. A  
MONTGOMERY, ALABAMA 36104  
TELEPHONE 334-269-0269  
FAX 334-323-5666

## **CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of this Motion to Continue Trial by electronic transmission or by placing a copy in the United States Mail with sufficient postage for first class delivery to the attorney named below or parties if not represented by counsel.

**DONE** this the 1st day of May, 2007.

/s/ Daniel G. Hamm

---

DANIEL G. HAMM (HAM043)  
ATTORNEY FOR THE DEFENDANT  
560 S. McDONOUGH ST., STE. A  
MONTGOMERY, ALABAMA 36104  
TELEPHONE 334-269-0269  
FAX 334-323-5666

Todd A. Brown  
Assistant United States Attorney  
Post Office Box 197  
Montgomery, Alabama 36101-0197